

A Perspective on Pipeline Control Room Management (CRM) Federal Regulatory Efforts

Congress & Control Rooms

■ **PSIA of 2002**

- Section 13(b)
 - CCert - Control Room Operator Qualification
 - Report to Congress on Pilot Program at 3 facilities
 - WA State Citizens Committee on Pipeline Safety 6/30/04
Recommendation Letter to PHMSA
 - » Focus on Transmission Pipelines/Go Beyond Training

■ **PIPES Act of 2006**

- PHMSA has at least 12 Other Tasks
- Section 12 - Pipeline CRM
 - All Gas and Liquid Pipelines
 - Address “Human Factors”
 - June 1, 2008 Deadline
- Sections 19, 20 - API 1165, Changes in Reporting

CRM Federal Reg Efforts

- **PHMSA CRM Public Workshop**

- May 23, 2007
- CRM Moving Quickly to Meet Congressional Deadline
- CCert Effort Now Morphed into CRM

- **DOT DMS Web Site for Pipeline CRM**

- <http://dms.dot.gov/search/searchFormSimple.cfm>
 - Docket No 27954

- **Today's Objective**

- Update This Committee
- Should Committee Act/Comment on CRM Efforts?

Observations On Current CRM

■ **CRM Approaches**

- Historically Not Well Defined in Regulation or Standards
 - SCADA Not Required
- Wide Diversification of Approaches
- Many Pipelines Approach Wisely Others Not So Wise
- SCADA Computer/Software Be the Cheap/Easy Part of CRM Process

■ **PHMSA CRM Effort Now Focused on 9 Core Enhancement Areas**

- See Docket for Details
- Appear Balanced if Maintain System Focus

Industry Reaction to CRM

- **API RP 1165 Issued January/2007**
 - Provides Guidance on Design & Implementation of New SCADA Displays
- **Some “What’s the Problem? - No Regulatory Need!”**
 - Especially Strong Resistance From Some Gas Transmission Spokespersons

Statements Elevating Concerns

- **Pipelines Don't Need Minimum CRM Regulation**
- **Historical Records Indicate No Problem in CRM**
- **Control Room Operators/Control Rooms Can't Overpressure Pipelines**
- **CRM Shouldn't Apply to Gas Transmission Pipelines**
- **C-Fer Defines PIZs for All Gas Transmission Pipelines**
- **RV Failure is [Simple] a Malfunction**

Recommendations

- **PHMSA Is Seeking Guidance on CRM**
 - CRM Should be a Safety Critical Issue Given Highest Priority
 - Slow Down & Do this Right in Separate Sections of Pipeline Safety Regs (e.g. IM)
 - Assure Proper System Approach/Control/Response
- **Performance Based Reg with Some Minimal Prescriptive Requirements**
 - Watch the Volume/Quality in New CRM Reg Sections
- **Should Apply to Gas & Liquid Transmission Pipelines**
 - Focus on High Energy Release Capable Systems